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*Attorney for Petitioner*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as

Case No. 25-cv-1963 (MEF)(MAH)

**CERTIFICATION OF MOLLY  
BIKLEN IN SUPPORT OF  
APPLICATION FOR  
ADMISSION *PRO HAC VICE*  
PURSUANT TO LOCAL RULE  
101.1**

Attorney General, U.S. Department of Justice,

*Respondents.*

I, **MOLLY BIKLEN**, of full age, do hereby certify as follows:

1. I am an attorney at the New York Civil Liberties Union Foundation (NYCLU), where I also serve as the Interim Legal Director, and I have been requested to represent Petitioner in this matter.
2. I am a member of good standing of the following bars:
  - a. New York State Bar: Admitted 2005  
Appellate Division, Second Judicial Department  
45 Monroe Place, Brooklyn, N.Y. 11201
  - b. U.S. Supreme Court: Admitted 2023  
Clerk, Supreme Court of the United States  
Admissions Office  
One First Street, NE, Washington, D.C., 20543
  - c. U.S. Court of Appeals, Second Circuit: Admitted 2020  
Thurgood Marshall United States Courthouse  
40 Foley Square, New York, N.Y. 10007
  - d. Northern District of New York: Admitted 2009

James T. Foley U.S. Courthouse  
445 Broadway, Suite 509, Albany, N.Y. 12207

- e. Southern District of New York: Admitted 2006  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, New York, N.Y. 10007
- f. Eastern District of New York: Admitted 2006  
United States District Court for the New York Eastern District  
225 Cadman Plaza East, Brooklyn, N.Y. 11201

3. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

4. In the event that I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by the New Jersey Court Rule 1:28-2(a) for each year in which I represent Petitioner-Plaintiff in this matter;
- b. Abide by the Rules of this Court, including any relevant disciplinary rules;
- c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and

d. Have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the United States District Court for the District of New Jersey.

5. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: March 21, 2025  
New York, N.Y.

Respectfully Submitted,



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